



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA ELECTRONIC MAIL

July 15, 2021

Glen Schultz
Project Coordinator
Waste Management, Inc.
100 Brandywine Blvd, Third Floor
Newtown, PA 18940

RE: Comments on Draft Phase I Landfill Cap Cover Repair Work Plan
Keystone Sanitation Landfill NPL Site, Union Township, Adams County, Pennsylvania

Dear Glen:

In accordance with Section XII, Paragraph 93(c) of the Consent Decree (Civil Action No. 1: CV-93-1482, *United States v. Keystone Sanitation Company, Inc. et al.*), EPA requests modification of the draft work plan, submitted on June 15, 2021, as described in this letter. The draft work plan was submitted by HydroGeologic, Inc. on behalf of the OU1 Defendants.

The comments, which included review from DEP and input from Original Generator Defendants, are as follows:

- 1) Section 1.1, first paragraph – Correct the site name and location.
- 2) Section 2.1, second paragraph – Ensure that the Site H&S Plan contains a description of how work will be conducted where waste is exposed, e.g., during removal of stumps, including air monitoring requirements and provisions for upgrades to Level C PPE or higher. Be aware that occasional workers on the Site for the purposes of conducting tasks of limited scope still may require a minimum amount of training in accordance with 29 CFR § 1910.120(e)(3)(ii) or may be able to be completed under supervision if provisions of 29 CFR § 1910.120(e)(9) are satisfied.
- 3) Section 2.1, second paragraph – The WP should indicate that the clean fill described in this section must meet the definition established in 25 Pa. Code § 271.1. The permeability of any burrow material must be confirmed to be compliant with the cover upgrade requirements in the 2000 ROD Amendment (i.e., 2.2×10^{-6} cm/s or less). The WP should describe how this will be accomplished.
- 4) Section 2.1, second paragraph, last sentence – Clarify the language to confirm for the reader that the actions described in this sentence apply to holes, depressions, pits, etc. created by the removal of stumps (as opposed to clearings created by the removal of trees and stumps).

- 5) Section 2.2 – EPA requests that an electronic copy of the survey data be delivered to EPA when available at the completion of Phase I activities.
- 6) Section 3.1, second paragraph – More clarity is required in regard to the differences between “reuse” and “disposal” and how each category applies to both wood chips and topsoil.
- 7) Section 3.2, first item – This section requires more detail for any intrusive work to be conducted. Criteria to be used for segregation and general characteristics that will be included in classifying materials should be outlined. Field logs should be completed as part of this task to document pertinent information, including but not necessarily limited to the spatial location on a map, the materials encountered, the amount and description of any MSW, thickness of soil cover, depth of excavations, etc. A photographic log should also be developed.
- 8) Section 3.2, first item – Given the potential for intrusive activities to encounter hazardous waste, any material selected for off-site disposal should be evaluated to determine if it demonstrates characteristics of hazardous waste. This section should describe how this would be accomplished, if required.
- 9) Section 3.2, second item – Ensure that substantive provisions of Commonwealth, county, and local regulations are met in the performance of this task, if required. No permits are required for any on-site work.
- 10) Section 3.3, third item – Provide more detail regarding the equipment proposed for use in both the aerial and ground survey equipment. It would be useful to include all or a portion of the existing wells in the survey, most critically those located in areas of suspected subsidence or tree and trunk removal. Any ELGE system features (e.g., GMPs, LMPs, LFG wells) that may be included should be surveyed to a vertical tolerance of 0.01 foot.
- 11) Figure 1 – The limit of refuse appears to overlap a limited portion of trees on the eastern/southeastern part of the landfill. Aerial photographs dated 1968 and 1981 show that the stand of trees located approximately in an area bound by GMP-12, GMP-13, and GMP-8 has appeared the same throughout this span (i.e., fully mature trees) and has not changed in extent, implying that MSW is not located beneath the stand. The extent of the Proposed Tree Cutting Area appears appropriate in the vicinity of GMP-12 considering the installation log showed no MSW (the log for GMP-8 also showed no MSW). However, the installation log for GMP-13 described MSW mixed with soil from a depth of 2 to 25 feet. It is recommended that the WP stipulate that trees in the immediate vicinity of GMP-13 be evaluated during field activities to determine if it would be appropriate to target any for removal due to potential presence above MSW.

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12) Appendix A – Ensure the repaired areas are included in relevant Phase I activities (e.g., land surveying).

Please feel free to contact me at (215) 814-3198 to discuss this matter in further detail.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chris Sklaney".

Christopher Sklaney
Remedial Project Manager

cc: L. Smith, PADEP
K. Svitana, BSI (OU2 Defendants' Project Coordinator)
D. Sutton, HGL